

Sin-Kie,

here are our geo comments to the Supplemental RFI Report dated 2/08. As I mentioned keep in mind that our TC as well as myself have not commented yet. Therefore, when you get my formal letter there may be additional comments.

Anthony

Comments:

1. The LNAPL areas are adequately delineated.
2. The dissolved ground water contamination is delineated both horizontally and vertically except for the area of AOC 31 (MW-250) where additional investigation is proposed.
3. In the discussion on page 132 of the ground water contamination, Chevron fails to mention that ammonia is present in the deep aquifer in wells SB-10 and MW-184 above the GWQS. These areas need to be horizontally and vertically delineated (N.J.A.C. 7:26E-4.1(a)1)
4. On page 332 Chevron continues to request an NFA for ground water for SWMU 41. A NFA can not be granted if there is mostly residual LNAPL present.
5. In general NFAs are not granted for individual AOCs or SWMUs for ground water. A ground water NFA is given for the site as a whole. In Chevron's situation there is free product present on site and dissolved contaminant levels above the Ground Water Quality Standards. A NFA for ground water can not be issued For individual AOCs or SWMUs the NJDEP may agree that there are no further ground water issues.
6. On page 360- Table 77, NFAs are requested for a number of units for ground water. As stated above, a NFA is issued for ground water for the site as a whole. The NJDEP could review the unit specifics and determine that if there are any further ground water issues. To make this process easier Chevron should submit a document which summarizes the history of the SWMU or AOC in question in terms of historical use, ground water and soil sampling results and any remedial activities conducted. Based on this summary, the NJDEP will determine if there are any further ground water issues.